

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

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ATTORNEYS FOR DEBTOR

In re:

LTL MANAGEMENT LLC,<sup>1</sup>

Debtor.

Chapter 11

Case No.: 21-30589 (MBK)

Judge: Michael B. Kaplan

LTL MANAGEMENT LLC,

Plaintiff,

v.

THOSE PARTIES LISTED ON APPENDIX A TO  
COMPLAINT and JOHN AND JANE DOES 1-1000,

Defendants.

Adv. No.: 21-3032 (MBK)

**Hearing Date and Time:  
January 11, 2022 at 10:00 a.m.**

<sup>1</sup> The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

**NOTICE OF DEBTOR'S MOTION FOR ENTRY OF AN ORDER  
AUTHORIZING THE FILING UNDER SEAL OF CERTAIN CONFIDENTIAL  
EXHIBITS FROM NORTH CAROLINA PRELIMINARY INJUNCTION HEARING**

PLEASE TAKE NOTICE that on January 11, 2022 at 10:00 a.m., or as soon thereafter as counsel may be heard, LTL Management LLC, the above-captioned debtor (the "Debtor"), by and through its counsel, shall move before the Honorable Michael B. Kaplan, United States Bankruptcy Court, at the United States Bankruptcy Court, Clarkson S. Fisher U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608, for the entry of an order pursuant to D.N.J. LBR 9018-1 to seal the filing of the confidential documents identified below (the "Confidential Documents"). The Confidential Documents are among those exhibits provided to the court and admitted into evidence during the November 4-5, 2021 preliminary injunction hearing in the United States Bankruptcy Court for the Western District of North Carolina, Case No. 21-30589 (MBK), and related Adversary Proceeding, Case No. 21-03032 (MBK).<sup>2</sup>

The Confidential Documents are

- Documents reflecting Debtor and non-Debtor affiliates' insurance coverage;
- Documents reflecting certain confidential general ledger accounting data of the former Johnson & Johnson Consumer Inc. ("Old JJCI") for the period 2007 until 2021 (including, in part, liabilities allocated to the Debtor);
- Documents containing third-party proprietary research, analysis, and intellectual property; and
- Commercially sensitive agreements between Johnson & Johnson Consumer Companies, Inc. and: (a) Pharma Tech Industries, Inc.; (b) PTI Royston, LLC; (c) Bausch Health Companies (f/k/a Valeant Pharmaceuticals); and (d) Valeant Pharmaceuticals International, Inc.

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<sup>2</sup> The above-captioned Chapter 11 proceeding and adversary case were transferred to this Court on November 16, 2021. See Dkt. 416.

**PLEASE TAKE FURTHER NOTICE** that in support of Debtor's Motion to Seal (the "Motion"), the Debtor shall rely on the Declaration of John K. Kim, which includes an Index, and the memorandum of law submitted herewith pursuant to D.N.J. LBR 9013-1(a).

**PLEASE TAKE FURTHER NOTICE** that, pursuant to D.N.J. LBR 9013-2, responsive papers, if any, must be filed with the Clerk of the Bankruptcy Court, Clarkson S. Fisher Courthouse, 402 East State Street, Trenton, New Jersey 08608, and served upon the Debtor's undersigned counsel no later than seven (7) days prior to the hearing.

**PLEASE TAKE FURTHER NOTICE** that, unless an objection is timely filed and served, the Motion will be deemed uncontested in accordance with D.N.J. LBR 9013-3(d) and the relief may be granted without a hearing

Dated: December 20, 2021

**WOLLMUTH MAHER & DEUTSCH LLP**

/s/ Paul R. DeFilippo

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